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10 *Attorneys for Fire Victim Trustee*

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

13 In re:
14 **PG&E CORPORATION,**

15 -and-

16
17 **PACIFIC GAS AND ELECTRIC**
18 **COMPANY,**

19 **Debtors.**

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF COUNSEL FOR
DAVEY ENTITIES REGARDING
STATUS OF SETTLEMENT WITH
THE FIRE VICTIM TRUST**

[Relates to Docket Number 14474]

Hearing Date: July 30, 2024

- 20 ☐ Affects PG&E Corporation
21 ☐ Affects Pacific Gas and Electric Company
22 ☒ Affects both Debtors

23 ** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

24
25 I, Jeffrey M. Reisner, hereby declare under penalty of perjury that the following is true to
26 the best of my knowledge, information, and belief:

27 1. I am a partner with Steptoe LLP, counsel to The Davey Tree Expert Company, Davey
28 Tree Surgery Company, and Davey Resource Group, Inc. (collectively, the “**Davey Entities**”). I

1 am duly authorized to make this Declaration (the “**Declaration**”) on behalf of Steptoe LLP, in its
2 capacity as counsel to the Davey Entities in Judicial Council Coordination Proceeding No. 4955
3 (“**JCCP 4955**”). Unless otherwise stated in this Declaration, I have knowledge of the facts set forth
4 herein and, if called as a witness, I would testify thereto.

5 2. I am an attorney at law licensed to practice law in the state of California. I, along
6 with other attorneys from Steptoe LLP and Nixon Peabody LLP have represented the Davey Entities
7 in JCCP 4955 since Judge Andrew Y.S. Cheng coordinated the lawsuits commenced on behalf of
8 the Fire Victim Trust against the Davey Entities (the “**FVT Actions**”) and lawsuits commenced on
9 behalf of certain of individual plaintiffs against the Davey Entities (the “**Non-Trust Plaintiff**
10 **Actions**”) into JCCP 4955 in 2021.

11 3. I submit this Declaration in connection with the *Fire Victim Trustee’s Response and*
12 *Objection to Motion of William B. Abrams Pursuant to Federal Rule Of Bankruptcy Procedure 2004*
13 *for Entry of an Order Authorizing Discovery and Trust Compliance With Court Orders* (the
14 “**Response**”) to which this Declaration attached as Exhibit 1.

15 4. I am generally knowledgeable and familiar with the filings, orders and other rulings
16 in JCCP 4955 with respect to the Davey Entities as well as the status of the lawsuits against the
17 Davey Entities in JCCP 4955.

18 5. The facts set forth in this Declaration are based upon my personal knowledge, my
19 review of relevant documents, and information provided to me by my colleagues at Steptoe. If called
20 upon to testify, I would testify to the facts set forth in this Declaration.

21 6. The FVT Actions have not been finally resolved as of the date hereof. The Non-Trust
22 Plaintiff Actions (other than those that were voluntarily dismissed) have not been finally resolved
23 as of the date hereof.

24 7. The Davey Entities agreed to participate in mediation (the “**Davey Entities**
25 **Mediation**”) to resolve both the FVT Actions and the Non-Trust Plaintiff Actions. As of the date
26 hereof, the Davey Entities Mediation is ongoing and has not reached a final resolution among the
27 parties.

1 I declare under penalty of perjury, as set forth in 28 U.S.C. § 1746, that the foregoing is true
2 and correct to the best of my knowledge, information, and belief.

3
4 Executed this 9th day of July, 2024, in Boynton Beach, Florida.

5
6
7
8 By:  _____

Jeffrey M. Reisner

Step toe LLP

Attorneys for The Davey Tree Expert Company,
Davey Tree Surgery Company, and
Davey Resource Group, Inc.